## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

Ronda A. Mettey

CASE No. <u>C-1-02 398</u> Plaintiff,

vs.

Judge Spiegel

American Family Mutual Insurance

Company, et al

Defendants. PLAINTIFF'S MOTION FOR

> EXTENSION OF TIME TO RESPOND TO DEFENDANT'S SUMMARY JUDGMENT MOTION;

MEMORAMDUM IN SUPPORT

Plaintiff by her undersigned attorney moves for an extension of time to respond to Defendants' Motion for Summary Judgment (Doc. 28). The deadline for filing is November 19, 2004. Defendants' attorney having been consulted, does not oppose this motion for an extension of time. Plaintiff requests an extension to December 3, 2004.

> /s/ John A. Rebel John A. Rebel (0031771) Attorney for Plaintiff McKinney & Namei 15 E. 8<sup>th</sup> St. Cincinnati, Ohio 45202 (513) 721-0200 Fax: 513- 632-5898 jarebel@fuse.net

## MEMORANDUM IN SUPPORT

Plaintiff's attorney is involved in other litigation in this court, that unexpectedly required the bulk of his time through November5th, so that sufficient time is not available for the matter at hand.

/s/ John A. Rebel

John A. Rebel (0031771) Attorney for Plaintiff

## **CERTIFICATION OF SERVICE**

The undersigned hereby certifies that the foregoing Motion is served upon Douglas Kennedy, Attorney for Defendants, by ordinary mail and electronic transmission to Roetzel & Andress, 155 E. Broad St., National City Bldg, 12<sup>th</sup> Floor, Columbus Ohio 45315 on this 18<sup>th</sup> day of November 2004.

/s/ John A. Rebel
John A. Rebel (0031771)
Attorney for Plaintiff